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To: Commission's Secretary
Office of the Secretary
Federal Communications Commission
Attention: CGB Room 3-B431

From: Tom Emmendorfer
Co-Owner
Showcase Technologies
2749 Thomas Drive
Cape Girardeau, MO: 63701

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Petition for Exemption of Closed Captioning Requirements based on Undue Burden

Showcase Technologies produces half hour real estate television programs displaying real estate property listings for sale. The shows consist of still photographs with text information about each listing displayed on the screen. Scripts for voiceover are generated via computer using the exact information that is shown on screen. An example of the information onscreen is supplied below (*see exhibit a*).

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| | <p>(Exhibit a)</p> <p>Listing information for each property is clearly displayed on the television screen. Closed captioning would be redundant and would cover up important information. Audio for the show is created using the exact information shown on screen.</p> |
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Showcase Technologies utilizes website integration to produce real estate television shows. The system automatically builds television listings, narrated website tours, print flyers and other marketing material with one online submission. Each television show is produced in a matter of minutes instead of hours or days. This is our main competitive edge. Adding closed captioning takes away this advantage and increases our television production time from a few minutes to several hours. This is a burden that would increase our production costs to the point where we would not be able to profit at our current price point. It would also keep us from producing additional shows without hiring more employees.

Because closed captioning would be redundant, would offer no additional information, would cover up pertinent on-screen information and would take away our competitive edge by dramatically increasing our production time and cost, Showcase Technologies is requesting exemption of closed captioning because of undue burden.

Truly,

Tom Emmendorfer
Partner, Showcase Technologies
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